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REMARKS

A request for reconsideration from the Final Office Action dated February 5, 2004. Claims 1-41 are pending in the present application. Claims 1-41 stand rejected. Various claims have been amended to remove the words "the step(s) of", which are not needed for grammatical consistency. This change does not narrow the scope of the claims.

35 U.S.C. § 102 RejectionsClaim 1 RejectionTomko Reference

Claims 1-3, 5-6, 8-21 and 23 stand rejected under 35 U.S.C. 102(a) as being anticipated by Tomko (U.S. Pat. No. 5,878,240).

In the response dated November 25, 2003, it is argued that Tomko does not disclose receiving configuration data, and that instead, Tomko only discloses receiving a data access request. Furthermore, the data access request of Tomko is not routed based on any configuration data as recited in claim 1. In the Final Action the Office responds by indicating that bus control 24 (FIG. 1) configures a transfer bus to forward a memory access to a target memory and that the configuration remains active.

The relied upon text of Tomko, beginning at line 19 of column 2, states:

When one processor needs to access another processor's memory, or alternatively, a memory not associated with a processor, it merely addresses that particular memory. A bus control monitors memory transactions from all processors and, upon seeing a memory transaction with an address outside of the spectrum assigned to that processor's respective memory, causes the processor associated with this target

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memory to temporarily relinquish its memory access. Then the bus control configures a transfer bus and forwards a memory access command to the target memory such that the source processor can then access the target memory as well as its own memory. This configuration remains active until any of the processors requests a memory address outside of the current configuration or the processor associated with the target memory requests its own memory again.

In Claim 1, reproduced below, specific missing elements are emphasized.

1. (Original) A method comprising:
receiving configuration data that indicates which one of a plurality of memory controllers will support each of a plurality of clients,
receiving data access requests from each of the plurality of clients; and
routing each of the data access requests to one of the plurality of memory controllers based on the configuration data.

Specifically, Tomko discloses a memory transaction address that is part of a data request and not configuration data that indicates routing information as recited. However, even if the memory transaction address of Tomko is considered configuration data, which it is not, the memory transaction address only identifies one controller to support one client, and not which one of a plurality of memory controllers will support each of a plurality of clients as recited. Furthermore, claim 1 recites routing data access requests from each client based on the configuration data. Therefore, even if the memory transaction address of Tomko were considered configuration data, it is only used to route a data access requests from one decoder and not from a plurality of clients as recited. For at least these reasons reconsideration of the rejection under Tomko is requested.

Murakami Reference

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Claim 1 further stands rejected under 35 U.S.C. 102(e) as being anticipated by Murakami et al. (U.S. Pat. No. 6,330,036) ("Murakami").

In the response dated November 25, 2003, it is argued that Murakami does not disclose receiving configuration data that indicates which one of a plurality of memory controllers will support each of a plurality of clients as recited in Claim 1. More specifically it was argued that no plurality of memory controllers is illustrated by Murakami. In the Final Action, the Office responds by indicating that enlarger/reducer units 310 of FIG. 9 are memory controllers as recited. However, this is not supported by Murakami. The Office further responds that decoders 202 in FIG. 7 are memory controllers as recited in claim 1. However, the decoders 202 do not receive configuration data that indicates memory controller support of each client or route data access requests from each client based on the configuration data as recited.

For at least these reasons, the rejections of claim 1 under § 102 based on Tomko and Murakami are respectfully requested to be withdrawn. In addition, rejections of claims 2-23, which depend from claim 1 and disclose additional non-obvious subject matter, should be withdrawn.

Claim 24 Rejection -- MacInnis

Claims 24-32 and 34 stand rejected under 35 U.S.C. 102(e) as being anticipated by MacInnis et al. (U.S. Pat. No. 6,189,064) ("MacInnis").

In the response dated November 25, 2003, it is argued that MacInnis does not disclose a router having a second input port coupled to the output port of the storage module as recited, and that MacInnis does not disclose a router that is to route data based upon the data stored in the recited storage module. In the Final Action, the Office refers to figure 27, stating that the memory controllers are connected to the video FIFO 148, which is a storage module. However, even if the FIFO were coupled to the memory select 1100, the FIFO is a video FIFO 148. Claim 1 recites a router to route data at each one of the plurality of first input ports to a respective

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output port of the first or second output port based upon the data stored in the storage module, the router of MacInnis does not route data at its inputs based upon data to be stored at the FIFO 148.

Reconsideration and withdrawal of the rejection of claim 24 and its dependent claims is solicited. In addition, claims 25-34, which depend from claim 24 have additional non-obvious subject matter.

Claim 37 Rejection -- Murakami

Claim 35 stands rejected under 35 U.S.C. 102(e) as being anticipated by Murakami et al. (U.S. Pat. No. 6,330,036) ("Murakami").

The Office argues in the Final Action (see third paragraph of section 6 of Final Action) that Murakami discloses the limitations of claim 35. The video decoders 202 of Murakami are part of a video pipeline than includes enlarger/reducer modules. The enlarger/reducer modules 310 receive decoded data from decoders 202, but do not route memory requests from the decoders as recited, nor are the enlarger/reducer modules 310 memory controllers. Alternatively, the embodiment of FIG. 7 illustrates a plurality of decoders 202 each having their own memory 204. The decoders 202 of FIG. 7 can access data from adjacent decoders through inter-video decoder connection lines 255 of FIG. 7. However, since inter-video decoder connection lines 255 of FIG. 7 are fixed connections between adjacent decoders there is no routing of a client request as recited in claim 35.

For at least this reason, the rejection of claim 35 under § 102 based on Murakami is respectfully requested to be withdrawn. In addition, rejections of claims 36-41, which depend from claim 35, are requested to be withdrawing in that they contain additional non-obvious subject matter.

Applicant(s) respectfully submit that the present application is now in condition for allowance. Accordingly, the Examiner is requested to issue a Notice of Allowance for all pending claims.

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Should the Examiner deem that any further action by the Applicant(s) would be desirable for placing this application in even better condition for issue, the Examiner is requested to issue a formal Notice of Allowance for all pending claims.

Respectfully submitted,

Date

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